

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: James Lee Norwood, Jr, Debtor**

**Case No. 24-00430-JAW  
CHAPTER 13**

**APPLICATION TO EMPLOY SPECIAL COUNSEL**

COMES NOW, Debtor (“Applicant”), by and through undersigned counsel, and pursuant to 11 U.S.C. §329, files this Application to Employ Special Counsel in the above Chapter 13 bankruptcy case and in support hereof would show unto the Court the following, to wit:

1. That Debtor represents that in the administration of the above referenced Debtors’ estate, it has been determined necessary to employ Special Counsel to provide assistance with the prosecution of the Debtor’s personal injury and property claim.
2. That the Debtor desires to employ Simien & Simien LLC to render services in connection with the claim as Special Counsel for the Debtor.
3. That it would be in the best interests of the estate that said firm be employed.
4. An attorney for Simien & Simien LLC has attached his affidavit hereto, stating that the attorney is a disinterested party to Debtor’s estate. See Exhibit “A”.
5. That in consideration of said representation, Simien & Simien will receive a contingency fee and reimbursement of costs, the total of which will not exceed 50% of the total recovery.

WHEREFORE PREMISES CONSIDERED, Applicant prays that the Court enter an Order authorizing the employment of Simien & Simien LLC as Special Counsel for the Debtor under the provisions set forth herein and by Order of this Court.

Respectfully submitted,

James Lee Norwood, Jr, APPLICANT

BY:

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr. (MSBN 103469)  
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**CERTIFICATE OF SERVICE**

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Application were forwarded on May 29, 2025, to:

By USPS First Class Mail:

Debtor

By Electronic CM/ECF Notice:

Case Trustee

U.S. Trustee

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.